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March 9, 2012

VIA ECF

The Hon. Steven M. Gold
Chief United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Lebovits, et al., No. 11 Crim. 134 (SJ-SMG)

Dear Chief Judge Gold:

I represent Moses Neuman in the above-referenced matter. Four of the defendants in this case, including Mr. Neuman, have filed pre-trial motions that have been referred for decision to Your Honor by Judge Johnson. On February 27, 2012, the government filed a memorandum of law in opposition to the defendants' motions. According to the current briefing schedule, the defendants' replies are due on March 19. I write on behalf of all of the moving defendants to request a one-month extension of the deadline to file the reply briefs, to April 19.

There have been no previous requests for extensions of time to file the reply briefs, and AUSA Charles Kleinberg consents to this request.

The reason for the request is that on March 13, I will begin a trial before Judge Block in another case, *United States v. Espada*. It is expected that this trial will last at least one month. Due to the demands of the *Espada* trial, the requested extension of time is necessary for me to prepare Mr. Neuman's reply to the government's 99-page opposition brief. This request for an extension is made on behalf of all moving defendants because the parties agree that all of the pre-trial motions should be on the same briefing schedule.

This requested extension would affect the April 5 telephone conference with Your Honor to discuss whether there will be oral argument and/or a hearing on the motions. The parties propose that this telephone conference be rescheduled at a time convenient for the Court during

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the week of May 7.

Thank you for your consideration.

Respectfully submitted,



Susan R. Nacheles

cc: All Counsel (*via ECF*)